

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

YOUNGBLOOD LAFFERTY

& SAMPOLI, P.A.

Cornerstone Commerce Center

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Attorneys for Debtor(s)

By: Chad M. Sherwood, Esquire

File No. N29196-CS

Case No.: 11-36092-JHW

In Re:

Adv. No:

Leroy Hartnett and Sandra Louise Hartnett,

Hearing Date: November 1, 2011

Judge: Judith H. Wizmur

**NOTICE OF MOTION TO CRAM DOWN THE SECOND MORTGAGE
CLAIM OF U.S. SMALL BUSINESS ADMINISTRATION**

TO:

Isabel Balboa, Chapter 13 Trustee
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

U.S. Small Business Administration
801 Tom Martin Drive
Suite 120
Birmingham, Alabama 35211

Gary K. Norgaard, Esquire
Stern Lavinthal Frankenberg & Norgaard, LLC
184 Grand Avenue
Englewood, NJ 07631-3507

PLEASE TAKE NOTICE that on November 1, 2011 at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorney for Debtor will move before the Honorable Judith H. Wizmur, U.S.B.J., United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, Fourth and Cooper Streets, Camden, New Jersey for an Order cramming down the third mortgage claim of First Colonial National Bank.

PLEASE TAKE FURTHER NOTICE that, at the return date herein, the undersigned will rely upon the annexed Certification.

PLEASE TAKE FURTHER NOTICE that any and all objections to the relief requested herein must be filed with the Court and served on the undersigned no later than seven (7) days prior to the hearing date set forth above.

Pursuant to D.N.J. LBR 9013-2, the undersigned counsel certifies that no brief is required, as the issues are primarily factual and the facts necessary to rule on the motion have been set forth in the attached Certification. Counsel further requests that this matter be heard on the papers unless opposition is filed or the Court requests oral argument.

YOUNGBLOOD, LAFFERTY,
& SAMPOLI, P.A.

BY:


Chad M. Sherwood, Esquire
Attorney for Debtors

DATED: October 3, 2011